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MEMO ENDORSEMENT

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DATE FILED: 4/14/25

METAx LLC v. META PLATFORMS, INC., 22 Civ. 6125 (LLS)

A line-by-line review of the documents sought in plaintiff's motion to compel and those sought to be redacted or sealed in defendant's application (and unauthorized sealing of an entire conference of the court with counsel) disclosed that, following the principles of Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006) and its progeny:

1. The motion to compel is granted, and defendant must produce all of the documents subject to the motion if it has not already done so;
2. The relief sought by the March 24 and 27, April 4 letters to the Court is denied in full and the documents concerned shall not be withheld, redacted, sealed, edited or altered in any way, but filed in their form and substance as originally produced and utilized;
3. The transcript of the March 13, 2025 conference shall be available in full, without omissions or redactions or alterations.

* * *

Applications to the Court, material submitted to it to affect its rulings, and the Court's rulings and actions, are all open to the public. In extreme cases there are exceptions, but they are

rare and the need for them must be established by facts, not epithets, adjectives or rhetoric.

So Ordered.

Dated: New York, New York

April 14, 2025

Louis L. Stanton
LOUIS L. STANTON
U.S.D.J.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

METAx LLC,

Plaintiff,

- against -

META PLATFORMS, INC.,

Defendant.

Civil Case No. 1:22-cv-06125

**NOTICE OF MOTION TO COMPEL DISCLOSURE OF
DOCUMENTS WITHHELD BY DEFENDANT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiff's Motion to Compel Disclosure of Documents Withheld by Defendant Meta Platforms, Inc. ("Defendant"), the accompanying Declaration of Dyan Finguerra-DuCharme, dated March 24, 2025 (the "Finguerra-DuCharme Declaration") and all exhibits thereto attached, and the accompanying Declaration of Justin Bolognino, dated March 24, 2025 and all exhibits thereto attached, Plaintiff METAx LLC ("Plaintiff"), by and through its undersigned counsel, will move this Court on a date and time to be determined by the Court for entry of an Order compelling Defendant to produce the 59 documents identified in Exhibit 4 to the Finguerra-DuCharme Declaration, pursuant to Fed. R. Civ. P. 37.

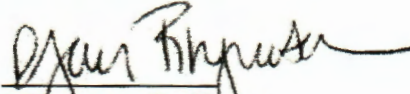
PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 6.1(b) of the Local Rules of the United States District Court for the Southern District of New York, opposing papers, if any, must be served and filed within 7 days after service of this motion, and reply papers, if any, must be served within 2 days after service of the opposition papers (if any).

Plaintiff hereby certifies, pursuant to Fed. R. Civ. P. 37(a)(1) that Plaintiff's counsel has met and conferred in good faith with counsel for Defendant via Zoom on multiple occasions, in an

effort to obtain the documents Defendant has improperly withheld without the need to seek judicial intervention, but such efforts have not been successful.

Dated: New York, New York
March 24, 2025

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